

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CIMC RAFFLES OFFSHORE (SINGAPORE) PTE.
LTD. AND YANTAI CIMC RAFFLES
OFFSHORE LIMITED,

Petitioners,

13 Civ. 4932

v.

BAERFIELD DRILLING LLC,

Respondent.

CIMC RAFFLES OFFSHORE (SINGAPORE) PTE.
LTD. AND YANTAI CIMC RAFFLES
OFFSHORE LIMITED,

Petitioners,

13 Civ. 4933

v.

SORATU DRILLING LLC,

Respondent.

**NOTICE OF MOTION OF BAERFIELD DRILLING LLC AND
SORATU DRILLING LLC TO DISMISS OR ALTERNATIVELY STAY
PETITION TO CONFIRM A FOREIGN ARBITRATION AWARD AND
FOR AN ENTRY OF JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and declaration of Gustavo Shinohara, respondents Baerfield Drilling LLC and Soratu Drilling LLC move this Court, before the Honorable Jed S. Rakoff, at the United States Courthouse, 500 Pearl Street, Room 14B, New York, New York, on September 9, 2013, at 4:30 p.m., for an order

pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, granting the Motion of Baerfield Drilling LLC and Soratu Drilling LLC to Dismiss or Alternatively Stay Petition to Confirm a Foreign Arbitration Award and for an Entry of Judgment for lack of subject matter jurisdiction, lack of personal jurisdiction, and failure to state a claim upon which relief can be granted, or alternatively to stay the petition, together with such other and further relief as this Court may deem just and proper.

Dated: New York, New York
August 7, 2013

Respectfully submitted,

Linklaters LLP

By: /s/ Paul S. Hessler

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